

Defendant Greenwood Publishing Group, Inc. d/b/a Heinemann (“Greenwood” or “Heinemann”) by and through its undersigned attorneys, submits this Answer to the Additional Causes of Action Against Greenwood Publishing Group, Inc. d/b/a Heinemann (“Additional Causes of Action”) [Dkt. No. 16] filed by Plaintiff Amplify Education, Inc. (“Amplify”). To the

extent not specifically admitted below, Heinemann denies the allegations of Amplify's Additional Causes of Action.

NATURE OF THE ACTION

1. Paragraph 1 contains legal conclusions to which no response is required.

PARTIES

2. Heinemann admits the allegations in Paragraph 2.
3. Heinemann admits the allegations in Paragraph 3.

JURISDICTION AND VENUE

4. Paragraph 4 contains legal conclusions to which no response is required.

To the extent a response is deemed required, Heinemann admits that the Court has subject matter jurisdiction over these counterclaims.

5. Paragraph 5 contains legal conclusions to which no response is required.

To the extent a response is deemed required, Heinemann admits that the Court has personal jurisdiction over this action but denies the remaining allegations of Paragraph 5.

6. Paragraph 6 contains legal conclusions to which no response is required.

To the extent a response is deemed required, Heinemann admits that venue is proper in this judicial district, but denies the remaining allegations of Paragraph 6.

**COUNT III: DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF U.S.
PATENT NO. 6,299,452**

7. Each of Heinemann's answers to the preceding paragraphs 1 through 6 is incorporated as if fully set forth herein.

8. Heinemann admits that an actual case or controversy exists between Amplify and Heinemann as to whether Amplify has infringed the '452 Patent. Heinemann otherwise denies the allegations in Paragraph 8.

9. Heinemann denies the allegations in Paragraph 9.

10. Heinemann denies the allegations in Paragraph 10.

COUNT IV: DECLARATORY JUDGMENT OF INVALIDITY OF U.S. PATENT NO. 6,299,452

11. Each of Heinemann's answers to the preceding paragraphs 1 through 10 is incorporated as if fully set forth herein.

12. Heinemann admits that an actual case or controversy exists between Amplify and Heinemann as to the validity of the claims of the '452 Patent. Heinemann otherwise denies the allegations in Paragraph 12.

13. Heinemann denies the allegations in Paragraph 13.

14. Heinemann denies the allegations in Paragraph 14.

PRAYER FOR RELIEF

Heinemann denies that Amplify is entitled to the relief it seeks in Paragraphs (A) – (F), or any other relief with respect to allegations made in their Additional Causes of Action.

JURY DEMAND

Heinemann demands a trial by jury on all issues triable by jury.

DATED: November 18, 2013

/s/ Cosmin Maier
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